

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION**

This Document Relates To:

THE DEALERSHIP CLASS ACTION

MDL No. 2817
Case No. 18-cv-00864

Honorable Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

NOTICE OF MOTION

To: All Counsel of Record

YOU ARE HEREBY NOTIFIED THAT on Tuesday, January 22, 2019 at 10:00 a.m., in Room 2303, or as soon thereafter as counsel may be heard, we shall appear before the Honorable Robert M. Dow, Jr., or any Judge presiding in that courtroom in the United States District Court for the Northern District of Illinois, Eastern Division, and shall then and there present **DEALERSHIP CLASS PLAINTIFFS' MOTION FOR THE ADVANCEMENT OF LITIGATION EXPENSES FROM THE SETTLEMENT WITH DEFENDANT THE REYNOLDS AND REYNOLDS COMPANY**, a copy of which has been served upon you.

This motion is brought pursuant to Federal Rules of Civil Procedure 23(h) and 54(d), and is made on grounds that advancing litigation funds to cover expenses reasonably and necessarily incurred to prosecute this action is fair and will promote the Dealership Class's interest in the continued effective prosecution of their action against CDK Global, LLC. This motion is based upon the supporting Dealership Class Plaintiffs' Motion for the Advancement of Litigation Expenses from the Settlement with Defendant The Reynolds and Reynolds Company, the supporting Declaration of Peggy J. Wedgworth (both filed contemporaneously herewith); the records, pleadings, and papers filed in this action, including the Court's Order preliminarily

approving the Settlement with Reynolds (ECF No. 432), and upon such argument as may be presented to the Court at the hearing on this motion.

DATED: December 19, 2018

Respectfully submitted,

/s/ Peggy J. Wedgworth

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CERTIFICATE OF SERVICE

I, Peggy J. Wedgworth, an attorney, hereby certify that on December 19, 2018, I caused a true and correct copy of the foregoing NOTICE OF MOTION to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth
Peggy J. Wedgworth